

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA, *
Plaintiff, *

v. *

CRIMINAL NO. 19-355 (FAB)

ANGEL LOPEZ-ZAYAS (1), *
RICARDO PEREZ-DELGADO (2), *
FREDDIE RAMOS-ORTIZ (3), *
JADIEL TORRES-RIJOS (4) *
Defendant. *

STATUS REPORT

TO THE HONORABLE FRANCISCO A. BESOSA,
JUDGE OF THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO.

COME NOW the parties and report on the status of the above-captioned case.

1. The government extended a plea offer. Any counter offer by the defense must be accompanied by mitigation evidence.

2. The defendants have conducted mitigation investigations and have received discovery from the government.

3. Due to the current pandemic, the defendant's mitigation investigation has not concluded. Document gathering from government agencies, private entities and private parties has been significantly curtailed. Additionally, defense counsels and the defendants have been unable to meet and review the discovery together.

4. The defendants propose, and the government agrees, that an extension of 90 days should be granted for the defense to conclude their investigation and review.

5. Any future government closure or restriction will require a further extension.

RESPECTFULLY REPORTED.

In San Juan, Puerto Rico this 25th day of September, 2020.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that this MOTION was filed through the CM/ECF system. The U.S. Department of Justice attorneys and/or the U.S. Attorney's Office for the District of Puerto Rico are designated as the parties to be notified through the system.

In San Juan, Puerto Rico this 25th day of September, 2020.

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